

The Talaria Company, LLC)	Departmental
d/b/a The Hinckley Company, LLC)	Findings of Fact and Order
Hancock County)	Air Emission License
Trenton, Maine)	
A-798-70-A-I)	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

The Talaria Company, LLC d/b/a The Hinckley Company, LLC (Hinckley) has applied for a Chapter 140 Air Emission License, permitting the operation of emission sources associated with their boat manufacturing facility located at Trenton, Maine.

FACILITY	The Hinckley Company, LLC
LICENSE NUMBER	A-798-70-A-I
LICENSE TYPE	Initial Part 70 License
NAICS CODES	3261, 336612
NATURE OF BUSINESS	Composite Fabrication
FACILITY LOCATION	Trenton, Maine
DATE OF LICENSE ISSUANCE	December 30, 2002
LICENSE EXPIRATION DATE	December 30, 2007

B. Emission Equipment

The following emission units are addressed by this Chapter 140 License:

Process Equipment

Emission Unit	Type of Equip.	Pollutants	Unit Type
Composite Fabrication	Spray guns and vacuum infusion	Fugitive VOC	Process Equipment
Assembly	Job shop	Particulate Emissions Fugitive VOC	Process Equipment
Surface Finishing	Spray Guns	Particulate Emissions Fugitive VOC	Process Equipment

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C. Insignificant Activities

Hinckley operates several furnaces, each with a maximum design heat input capacity of less than 3.0 MMBtu/hr. Since these furnaces have heat input capacities less than 3.0 MMBtu/hr, they are noted for inventory purposes only. For this initial Chapter 140 license, these units are considered “insignificant activities” per Appendix B Section B(2) due to their size.

D. Application Classification

Hinckley emits more than 10 tons per year of a single hazardous air pollutant and is therefore classified as a major source. The application for Hinckley does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department’s regulations for a Part 70 source.

E. General Facility Requirements

Hinckley is subject to the regulations listed below, in addition to the regulations listed for specific units as described in Section II of this license.

CITATION	REQUIREMENT SUMMARY
Chapter 101	Visible Emissions Regulation
Chapter 105	General Process Source Particulate Emission Standard
Chapter 106	Low Sulfur Fuel
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 114	Classification of Air Quality Control Regions
Chapter 116	Prohibited Dispersion Techniques
Chapter 137	Emission Statements
Chapter 140	Part 70 Air Emission License Regulations

II. EMISSION UNIT DESCRIPTION

A. Process Description

Hinckley's primary activities are boat manufacturing. The boats are built using mainly gelcoat, fiberglass and resin. Other raw materials include Kevlar, carbon fiber, paint, varnish, wood, foam, etc.

For licensing purposes, the manufacturing process is divided into the following process areas: Fiberglass Manufacturing, Assembly Activities and Surface Finishing Activities.

a. Fiberglass Manufacturing

The manufacturing of fiberglass boats at Hinckley begins with hull and deck construction, using a combination of the open mold and closed mold methods. This portion of Hinckley's overall boat building process utilizes unsaturated polyester and vinyl ester resins and gelcoats. The unsaturated polyester resins contain a styrene monomer as the linking agent, which partially volatilize during spraying and curing. The lamination process for hull and deck construction consists of both closed mold (vacuum infusion) in which resins are infused into a closed mold under vacuum pressure and open contact molding in which layers of gelcoat or resin impregnated fiberglass reinforcement are laid up on an open mold.

The initial step in the lamination process is the spraying of a gelcoat layer on the waxed mold surface. Gelcoating is the application of a layer of resin with no reinforcing materials contained in it. The gelcoat contains unsaturated polyester resin, catalyst, and pigments to create the smooth outer surface of the hull and for ultraviolet light protection. The gelcoat is applied by using HVLP resin applicators which mix the resin and catalyst as it is applied. Following the gelcoating, a skin coat of resin and chopped fiberglass is applied on the mold. Gelcoating and skin coating are done using the open mold technique.

Following proper curing of the hull, additional layers of reinforced materials such as balsa wood, fiberglass or carbon fiber are applied to the hull. The thickness of the lamination depends on both the style of boat and the location within the hull (i.e. high stress areas will have more layers applied). The structural materials are then covered by a plastic membrane. Using a vacuum infusion method, the resin is drawn through the structural materials and allowed to cure. There are no exposed resin surfaces in this closed-mold

process; thus VOC emissions are virtually eliminated. An increased rate of polymerization is achieved with the closed mold method relative to an open mold process due to the elimination of airflow across the surface of the product. Grinding, sanding, and machining of fiberglass surfaces are performed at this stage where PM₁₀ is produced.

Hinckley uses the closed-mold infusion process whenever possible to manufacture the majority of hulls and decks.

b. Assembly Activities:

The assembly phase is responsible for the actual installation of the various components/accessories of the boat into the hull. Following installation of all interior/cabin furnishings and equipment, the deck is attached to the hull in the assembly phase. All woodworking is also completed on site. VOC emissions result from the use of relatively small amounts of various glues, putties, resins, cleaning solvents, and occasional touch up/repair work.

c. Surface Finishing

Hinckley surface finishes hulls of completed boats in a designated surface finishing building consisting of three bays. The exhaust is filtered to control particulate emissions that would otherwise pass through the fan to the outside. Some minor amounts of varnishing and painting are performed in other areas.

B. VOC Emission Sources / BPT for VOC Control

Hinckley was issued Air Emission License A-798-71-A-N on June 12, 2000, which incorporated requirements of Best Available Control Technology (BACT). The BACT findings in Air Emission License, A-798-71-A-N, are incorporated as a BPT analysis into this initial Part 70 license.

The Fiberglass Department is responsible for the majority of VOC emissions and hazardous air pollutants (HAP). Styrene emissions, considered a HAP, are attributed to evaporation of resin or gelcoat overspray and vaporization from the applied resin or gelcoat prior to polymerization. Hinckley is classified as a major source and subject to Part 70 due to emitting a "single" HAP, styrene emissions, over 10 tons per year.

Due to polymerization of the styrene monomer, not all of the VOC/HAP as delivered is volatilized or emitted. Hinckley shall calculate styrene emissions from resin and gelcoat application processes using the Unified Emission Factor (UEF)

estimation models for open molding of composites which is based on a compilation of research conducted by the Composites Fabricators Association (CFA), the National Marine Manufacturing Association (NMMA), and the United States Environmental Protection Agency (USEPA). The model contains emission factors presented in a document published by the CFA entitled “Technical Discussion of the Unified Emission Factors for Open Molding of Composites” dated April 7, 1999.

The following determinations meet BPT for this initial Chapter 140 license:

- Employ the closed-mold technology whenever possible for the manufacture of fiberglass boat parts;
- For open-mold resin application, employ high transfer efficiency equipment such as airless spray equipment and flow coaters;
- Limit VOC content to 40% for pigmented gelcoats and 48% for clear gel coats;
- Limit overall facility-wide VOC emissions to 39 tons per year;
- Continue ongoing research and manufacturing test trials of pollution prevention technologies such as low styrene resins and water-based or low vapor pressure cleaning solvents;
- Maintain good housekeeping practices (i.e., lids on, proper storage of open containers, etc.)
- Maintain records of monthly resin, gel coat, and solvent usage facility wide, based on monthly purchases;
- Control PM emissions from the grinding, sanding, cutting, and buffing activities that vent outside with particulate filters, the visible emissions from each vent will be limited to 10% opacity based on a 6-minute average.

C. Periodic Monitoring for VOC and HAP

To determine compliance with the BPT findings in this Chapter 140 license, Hinckley shall maintain, and make available upon request, a current list of all resins and cleaning materials in use. This list shall provide the necessary data to determine compliance, including:

- a) Resin, catalyst, and cleaning materials in use.
- b) Percent VOC by weight for each resin, and the pounds VOC per gallon of cleaning materials.
- c) The amount and type of resin materials used on a monthly basis
- d) The amount and type of cleaning materials used on a monthly basis

The monthly totals of VOCs and HAPs shall be calculated and tracked on a 12-month rolling total basis. Hinckley shall maintain these records for 6 years and make them available upon request from the DEP. The chemical usage and rolling total VOC/HAP emission calculations, for the previous 12-month period, will be reported in the semi-annual report. These parameters will also be submitted in an annual report as required by Chapter 137.

Hinckley will also perform in-house inspections to maintain and promote “good housekeeping” practices (closed lids, proper storage of open containers, etc.) and ensure that all VOC materials are handled properly to minimize emissions. These inspections will be part of Hinckley’s periodic monitoring and reportable to the Department only upon request. The log will contain the number of inspections and any spills, clean ups, etc. that occurred.

D. Operational Flexibility

Chapter 140 incorporates provisions to ensure that companies in Maine have the maximum operational flexibility to take advantage of changing market conditions. Hinckley’s process is continually adapting to meet customer demands, therefore, a flexible Chapter 140 permit is necessary. Given Hinckley's continuously changing process, combining all operations and facility-wide license conditions has proven to be the most effective strategy. The following terms for reasonably anticipated alternative operating scenarios will be included in this license:

- The Hinckley Company will have the flexibility to substitute and add resin and gelcoat application equipment as necessary without triggering notification of the Department or license revisions provided that the BPT provisions are adhered to.
- The products/chemicals associated with each phase of the boat manufacturing are included in the Chapter 140 application form and are based on Hinckley’s 2001 inventory. These products are representative of Hinckley's annual chemical usage but do not comprise a complete list of all potential products required by Hinckley for the manufacturing of boats. Therefore, product interchanging as necessary is allowed without triggering reporting or additional licensing as long as Hinckley abides by all State and Applicable requirements.
- Currently, Hinckley’s business is comprised of the manufacturing of boats. However, if during the term of this license market demands or opportunities are identified in manufacturing other composite items, Hinckley shall not be restricted to boat manufacturing as long as Hinckley complies with all State and Applicable regulations.

In addition, Chapter 140 states that insignificant activities and modifications to insignificant activities that remain insignificant will not require notification to the Department. Hinckley has identified all current insignificant activities in Section C of the Chapter 140 application, however, Hinckley may add additional insignificant activities without notification to the Department.

E. Boat Manufacturing NESHAP (MACT)

Hinckley is licensed to emit up to 39 tons of VOC per year thus Hinckley's potential to emit is greater than 10 tons per year for any single HAP and 25 tons per year for all HAPs combined, and is therefore defined as a major source for HAPs. On August 22, 2001 the EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing. The NESHAP requires all major sources of HAPs to meet emission standards that reflect Maximum Achievable Control Technology (MACT). Hinckley will comply with the MACT for boat manufacturing by the regulatory deadline of August 23, 2004.

Hinckley's operations are not subject to any NSPS requirements as written in 40 CFR Part 60.

F. Facility Emissions

The total facility emissions from Hinckley consist of only the process VOC emissions from the composites fabrication operations.

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

<u>Pollutant</u>	<u>TPY</u>
PM	N/A
PM ₁₀	N/A
SO ₂	N/A
NO _x	N/A
CO	N/A
VOC	39.0

Note: All boilers and other processes are considered insignificant due to their size, therefore, process VOC emissions is the only criteria pollutant emission applicable and thus requires a ton per year limit.

III. AIR QUALITY ANALYSIS

According to Chapter 140 of the Department's regulations, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

<u>Pollutant</u>	<u>Tons/year</u>
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on facility license allowed emissions, Hinckley is below the emissions level required for modeling.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-798-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Hinckley pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140. For each standard and special condition which is

state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Standard Statements

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;
- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
 - (a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
 - (b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

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Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

Permit shield table for the facility

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated November 1, 2001.

SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
Boilers or furnaces	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	All boilers at Hinckley are below a maximum design heat input capacity of 10 MMBtu/hr.
Facility	40 CFR Part 63, Subpart JJ	NESHAP for Wood Furniture Manufacturing Operations	Hinckley's Trenton facility is not primarily engaged in the manufacture of wood furniture and does not use more than 100 gallons per month of finishing material or adhesives in the manufacturing of wood furniture components.
Facility	40 CFR Part 63, Subpart II	NESHAP for Shipbuilding and Ship Repair	This facility manufactures pleasure crafts and is therefore not considered a "ship builder" as defined by 40 CFR 63.782
Facility	40 CFR, Part 68	Chemical Accident Prevention Provisions (CAA Sec 112r)	Hinckley does not store any regulated substance in excess of the thresholds contained in Part 68.
Facility	40 CFR, Part 82, Subparts A-E	Protection of Stratospheric Ozone	Hinckley does not produce, destroy, import or export a controlled substance or import a controlled product.
Facility	MEDEP Chapter 111	Petroleum Liquid Storage Vapor Control	Hinckley does not have a fixed roof storage vessel with a capacity greater than 39,000 gallons containing volatile petroleum liquids with true vapor pressure greater than 1 psia.

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Facility	MEDEP Chapter 117	Source Surveillance	Hinckley does not operate fuel-burning equipment that meets the specifications necessary to be subject to this Chapter (i.e. greater than 100 MMBtu/hr heat input capacity).
Facility	MEDEP Chapter 118	Gasoline Dispensing Facilities Vapor Control	Hinckley does not have any on-site gasoline storage tanks, therefore not subject to this rule.
Facility	MEDEP Chapter 126	Capture Efficiency Test Procedures	Hinckley does not employ add-on controls to any VOC emissions activities and therefore is not subject to this rule.
Facility	MEDEP Chapter 129	Surface Coating Facilities	Hinckley does not surface coat cans, fabric, vinyl, metal furniture, or misc. metal parts.
Facility	MEDEP Chapter 134	VOC RACT	Hinckley is limited to less than 39 tons VOC per year and therefore is not subject to this rule.

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- (a) Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;
 - (b) Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
 - (c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
 - (d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

Standard Conditions

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;

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- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;

Enforceable by State-only

- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for

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- continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.
- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:
 - (i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
 - (ii) to demonstrate compliance with the applicable emission standards; or
 - (iii) pursuant to any other requirement of this license to perform stack testing.
 - (b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (c) submit a written report to the Department within thirty (30) days from date of test completion.
- Enforceable by State-only**
- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:
- (a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative

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of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- (b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- (c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

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- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.
 - a. The licensee shall notify the Commissioner within 48 hours of a violation in emission standards and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;
 - b. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in

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- part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.
- c. All other deviations shall be reported to the Department in the facility's semiannual report.
- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.
- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
- (a) The identification of each term or condition of the Part 70 license that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
 - (e) Such other facts as the Department may require to determine the compliance status of the source;

Specific Conditions

- (14) Hinckley is subject to the following Department Regulations:

Citation	Regulation
Chapter 101	Visible Emission Regulation
Chapter 105	General Process Source Particulate Emission Standard

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Chapter 106	Low Sulfur Fuel
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 114	Classification of Air Quality Control Regions
Chapter 116	Prohibited Dispersion Techniques
Chapter 137	Emission Statements
Chapter 140	Part 70 Air Emission License Regulations

(15) Hinckley shall not emit more than 39 tons of VOC per year, on a 12 month rolling total basis, from the Trenton boat building facility, based on chemical purchase receipts. [MEDEP Chapter 140, BPT]

(16) To ensure compliance with annual emission limits, Hinckley shall record on a monthly basis raw material purchases, which contain VOC and HAPs. The raw materials will be considered used during the month they are purchased. With the exception of styrene and methyl methacrylate emissions from the application of gelcoat, resin, and putties, the following equations will be used to calculate VOC and HAP emissions on a 12 month rolling total basis:

$$\text{VOC Emissions} = (\text{Monthly Product Purchases} * \% \text{VOC}) - (\text{Monthly Hazardous Waste Removed from Site} * \% \text{VOC})$$

$$\text{HAP Emissions} = (\text{Monthly Product Purchases} * \% \text{HAP}) - (\text{Monthly Hazardous Waste Removed from Site} * \% \text{HAP})$$

[MEDEP Chapter 140, BPT]

(17) Hinckley shall calculate styrene and methyl methacrylate emissions from the application of gelcoats, resins, and putties on a 12-month rolling total basis using the Unified Emissions Factor model for open molding of composites. All other chemicals are to be based upon mass balance calculations. Emissions from Hinckley's closed molding parts shall be calculated using the appropriate EPA emissions factors for closed molding technology. [MEDEP Chapter 140, BPT]

(18) Hinckley shall maintain and implement written procedures to promote "good housekeeping" practices (close lids, proper storage open containers, etc.) and ensure that all VOC containing materials are handled properly to minimize emissions. The procedure shall ensure that all VOC containers are properly sealed when not in immediate use, and that all VOC containers are handled in a manner to reduce the chance of spills. The Hinckley Company shall conduct and log monthly self-inspections of each area to minimize emissions. The procedures

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and/or log shall be submitted to the Department upon request. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

- (19) Hinckley shall use clear gelcoats with no more than 48% content VOC monomer and pigmented gelcoats with no more than 40% content VOC monomer and keep records to demonstrate compliance. The applicable VOC % content MACT requirements must be met on August 23, 2004. [MEDEP Chapter 140, BPT]
- (20) Hinckley is subject to 40 CFR Part 63 Boat Manufacturing MACT. The compliance date for existing boat manufacturing sources is August 23, 2004. After this date, Hinckley shall comply with all applicable requirements of this regulation, including the specific coating limits and recordkeeping/reporting requirements. [40 CFR Part 63]
- (21) To minimize VOC emissions from resin application, Hinckley shall use the closed-mold method (i.e., vacuum infusion) whenever this technology has proven to reliably work and cost effective. For applications when the closed-mold method is not feasible or cost effective, Hinckley shall use the mechanical, non-atomized or airless spray gun technique for resin application in all but the manufacture of small and/or irregular parts. Hinckley shall meet the Maximum Achievable Control Technology (MACT) standard for open molding included in the National Emission Standard for Hazardous Air Pollutants for the Boat Manufacturing Industry by August 23, 2004.
- (22) Particulate matter emissions from bag filters and spray booth filters are generally unquantified; therefore particulate matter emissions from bag filters shall be limited to 10% opacity based on a 6 minute block average and 10% opacity based on a 6 minute block average for spray booth filters. Hinckley shall properly maintain all dust collection equipment in the facility and make repairs as necessary to prevent or minimize system leakage. [MEDEP Chapter 140, BPT]
- (23) Visible emissions from any general process source, not vented through a baghouse or fabric filter, shall not exceed an opacity of 20% on a 6-minute block average basis, except for no more than 1 six-minute block average in a 1-hour period. Hinckley shall perform such housekeeping and clean up as is necessary to prevent or minimize fugitive emissions. Hinckley shall conduct and log monthly self-inspections of each area to minimize emissions and make this log available upon Department request. [MEDEP Chapter 101]
- (24) Hinckley shall continue research and manufacturing test trials of pollution prevention technologies (low styrene resins, closed mold systems, etc.) to

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minimize VOC emissions. An annual report documenting the research and test trial results for the previous year shall be submitted in the annual compliance certification. [MEDEP Chapter 140, BPT] **State-only Enforceable**

(25) Semiannual Reporting

The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due July 30, 2003 and every six months thereafter.

- A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(26) Annual Compliance Certification

The licensee shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 30, 2004 and every year thereafter. [MEDEP Chapter 140]

(27) A. Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

**Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017**

Phone: (207) 287-2437

The emission statement must be submitted by September 1.

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B. Toxic Air Pollutants Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall report, no later than September 1, every two years (1996,1998,etc.) or in a timeframe designated to the Department, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

**Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017**

Phone: (207) 287-2437

- (28) The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. Section 3 §585-B, sub-§5	Reduce Mercury Use and Emissions	Enforceable by State-only

(29) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.

[40 CFR, Part 82, Subpart F]

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(30) Certification by a Responsible Official

All reports (including semiannual reports and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(31) Hinckley shall pay the annual air emission license fee within 30 days of June 30th of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3.

(32) The term of this order shall be for five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2002.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: November 1, 2001

Date of application acceptance: November 15, 2001

Date filed with Board of Environmental Protection: _____

This order prepared by Edwin Cousins , Bureau of Air Quality